

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**

**And**

**WESTERN DISTRICT OF VIRGINIA AS TO 7:12CV544 ONLY**

**FILED**  
NOV 27 2012  
CLERK, US DISTRICT COURT  
NORFOLK, VA

OPENMIND SOLUTIONS, INC.,

Plaintiff,

v.

JOHN DOE,

Defendant.

Case No. 7:12-cv-00544  
Case No. 2:12-cv-00598  
Case No. 2:12-cv-00599  
Case No. 2:12-cv-00600  
Case No. 2:12-cv-00601  
Case No. 3:12-cv-00811  
Case No. 3:12-cv-00812  
Case No. 3:12-cv-00813  
Case No. 3:12-cv-00814  
Case No. 1:12-cv-01272  
Case No. 1:12-cv-01283

**PLAINTIFF'S MOTION TO CONSOLIDATE CASES**

Plaintiff Openmind Solutions, Inc., respectfully requests the above captioned cases be consolidated into one action. Rule 42 of the Federal Rules of Civil Procedure permits a court to consolidate actions pending before it if those actions involve "a common question of law or fact." Fed. R. Civ. P. 42(a). The above captioned cases involve "a common question of law or fact" and, as such, satisfy the consolidation requirement under Rule 42(a). For this reason, as more fully set forth in the attached memorandum of law, the Court should grant Plaintiff's motion and consolidated the above captioned cases.

Respectfully submitted,

DATED: November 26, 2012

By: /s/ Timothy V. Anderson  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 26, 2012, all individuals of record who are deemed to have consented to electronic service are being served true and correct copy of the foregoing documents, and all attachments and related documents, using the Court's ECF system.

By: /s/ Timothy V. Anderson  
Timothy V. Anderson

**MOTION DENIED.**

Entered this 27<sup>th</sup> day of Nov. 2012

- RBS  
Rebecca Beach Smith  
Chief  
United States District Judge